



COLSF 7.4 VI

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 22, 1991

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SUPPORT BRANCH

Mr. Dean Fowler
Spokane County Utilities
North 811 Jefferson Street
Spokane, Washington 99201

RE: Comments on Suggested Sampling Frequency for Colbert
Domestic Well Sampling Program, Dated December 14, 1990

Dear Mr. Fowler:

Ecology has reviewed your contractor's suggested sampling frequency. We believe the concept of basing the frequency on technical factors and site conditions is sound. We find the suggested frequency is a good cut at a complex problem. However, refinement of the suggested frequency should include the rationale for exposure periods, and a clear demonstration that the goal is protective of human health. A flow chart for the decision making process is suggested. Specific comment follows:

1. The 7 to 70 year exposure periods for the Performance Standards has not been explained or justified. Please identify the rationale for these periods. The rationale should include assumptions, concepts, risk assessment calculations, appropriate scientific references, and demonstrate protection of public health.
2. The linkage of the potential exposure period of one year or less with the performance standards has not been explained or justified. Please identify the rationale as in Comment No. 1 above.
3. One of the recommendations is to sample some peripheral wells on a biennial basis, or delete them from the program entirely. There is no guidance provided to which the Sampling Committee might refer in making a decision to delete a well. It would be helpful if there were some discussion of factors that might distinguish a well for deletion from the program, as opposed to continued sampling on a biennial basis.
4. The summary on page 6 accurately reflects the criteria for selecting the sampling frequency for any particular well, as those criteria are laid out in the preceding pages. These criteria define a hierarchical decision tree which is rather long and complex, and the summary ends up making the tree appear more complex than it really is. A flow chart of the decision making process is strongly suggested.

If you have any questions, please do not hesitate to contact me at (206) 438-3079.

Sincerely,

Michael Kuntz
Site Cleanup Section
Toxics Cleanup Program



cc: Neil Thompson, EPA
Larry Beard, Landau Assoc.